

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**Tammy Lockett, as Beneficiary and
Personal Representative of the Estate
Of Donald Raymond, Sr.,**

Plaintiff,

v.

**E.I. du Pont de Nemours and Company,
BASF Corporation, The Sherwin-Williams
Company, PPG Industries, Inc., Energy
Transfer (R&M), LLC, Ashland, LLC,
Univar Solutions USA, Inc., Union Oil
Company of California d/b/a Unocal,
individually as Successor-an-Interest
to American Mineral Spirits Company,
Shell Oil Company, Atlantic Richfield
Company and John Does 1-20,**

Defendants.

Civil Action No. 2:24-cv-05876

STIPULATED MOTION TO REMAND

Defendant BASF Corporation and Plaintiff Tammy Lockett, as Beneficiary and Personal Representative of the Estate of Donald Raymond, Sr., (collectively the “Parties”) stipulate to remand the above-referenced case to the Philadelphia Court of Common Pleas, Case ID: 240801938 with each Party bearing its own attorneys’ fees and costs. After reasonable investigation, the Parties have concluded that there is not complete diversity between Plaintiff and each Defendant in this matter and a remand to the Philadelphia Court of Common Pleas is required. The Parties will submit a proposed order concurrently herewith.

SIGNATURES ON FOLLOWING PAGE

Dated: November 22, 2024

Respectfully submitted,

/s/ Joshua M. Peles

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2024, I caused a true and correct copy of the foregoing Stipulation to Remand to be filed and served upon all counsel of record via the electronic court filing (ECF) system for the U.S. District Court for the Eastern District of Pennsylvania and is available for viewing and downloading.

/s/ Joshua M. Peles

Joshua M. Peles